

**To:** tim.curtin@usecology.com/[tcurtin16@aol.com];  
cory.mcmann@usecology.com[cory.mcmann@usecology.com]  
**Cc:** frodriguez@gesoncall.com[frodriguez@gesoncall.com];  
jkite@gesoncall.com[jkite@gesoncall.com]; joel.belloni@usecology.com[joel.belloni@usecology.com];  
jim.vigrass@usecology.com[jim.vigrass@usecology.com]; Pellegrino, Carl[Pellegrino.Carl@epa.gov]; Joe  
Weismann[joe.weismann@usecology.com]; Nguyen, Lyndsey[Nguyen.Lyndsey@epa.gov];  
Peter.Lisichenko@WestonSolutions.com[Peter.Lisichenko@WestonSolutions.com]  
**From:** Daly, Eric  
**Sent:** Fri 12/16/2016 5:33:58 PM  
**Subject:** NFB Site: Area 5 Disposal Proposal

Thanks Tim. This is great news. Also, thank you Joe for reviewing in such a short time in order for us to finalize our travel and work plans. Frank, please work with Jim to figure out how to coordinate the amount and timing of trucks for Monday, December 19<sup>th</sup> through Wednesday, December 21<sup>st</sup>.

As far as the technical comments regarding the proposal. Joe, Lyndsey is traveling at this point but may be able to chime in eventually. I would just like some clarification on your revision if you could. This is my understanding of Lyndsey's concept as I read it and how it has been explained to me.

Table 2 below is what I believe you are referring to in your email. This represents three different sample points. We had more sample locations but these were the top three high value sample points. Each sample point consists of a column with four 6 inch layers. Each layer a soil sample was analyzed. Therefore, we are looking at 12 different soil sample results in Table 2. I believe Lyndsey is looking for the highest sample value within each layer of the three sample points. Figure 2 below illustrates that concept. It just so happens that each sample point had the highest individual value at the 12-18 inch mark. What I believe Joe is looking at is taking the top three sample layer values from all 12 available sample results? Meaning, you are taking two layers from the "Highest Medium" sample column since the 0-6 inch result is greater than the highest value of the "Second Highest Medium" Sample. At your convenience Joe, please give us your clarification and we will finalize the document. As Joe mentioned, this does not affect our moving forward with the disposal since both scenarios meet the acceptance criteria.

Thanks  
all.

		Highest Medium (pCi/g)	Sec
0-6 inches	Radium-226 (Ra-226)	29.64	
	Thorium-232 Th-232)	27.13	
	Uranium-238 (U-238)	29.64	
6-12 inches	Radium-226 (Ra-226)	1.38	
	Thorium-232 Th-232)	7.51	
	Uranium-238 (U-238)	1.38	
12-18 inches	Radium-226 (Ra-226)	62.73	
	Thorium-232 Th-232)	59.25	
	Uranium-238 (U-238)	73.35	
18-24 inches	Radium-226 (Ra-226)	2.13	
	Thorium-232 Th-232)	1.76	
	Uranium-238 (U-238)	2.48	

Table 2. shows the highest, second highest, and third depth. The highest values for category

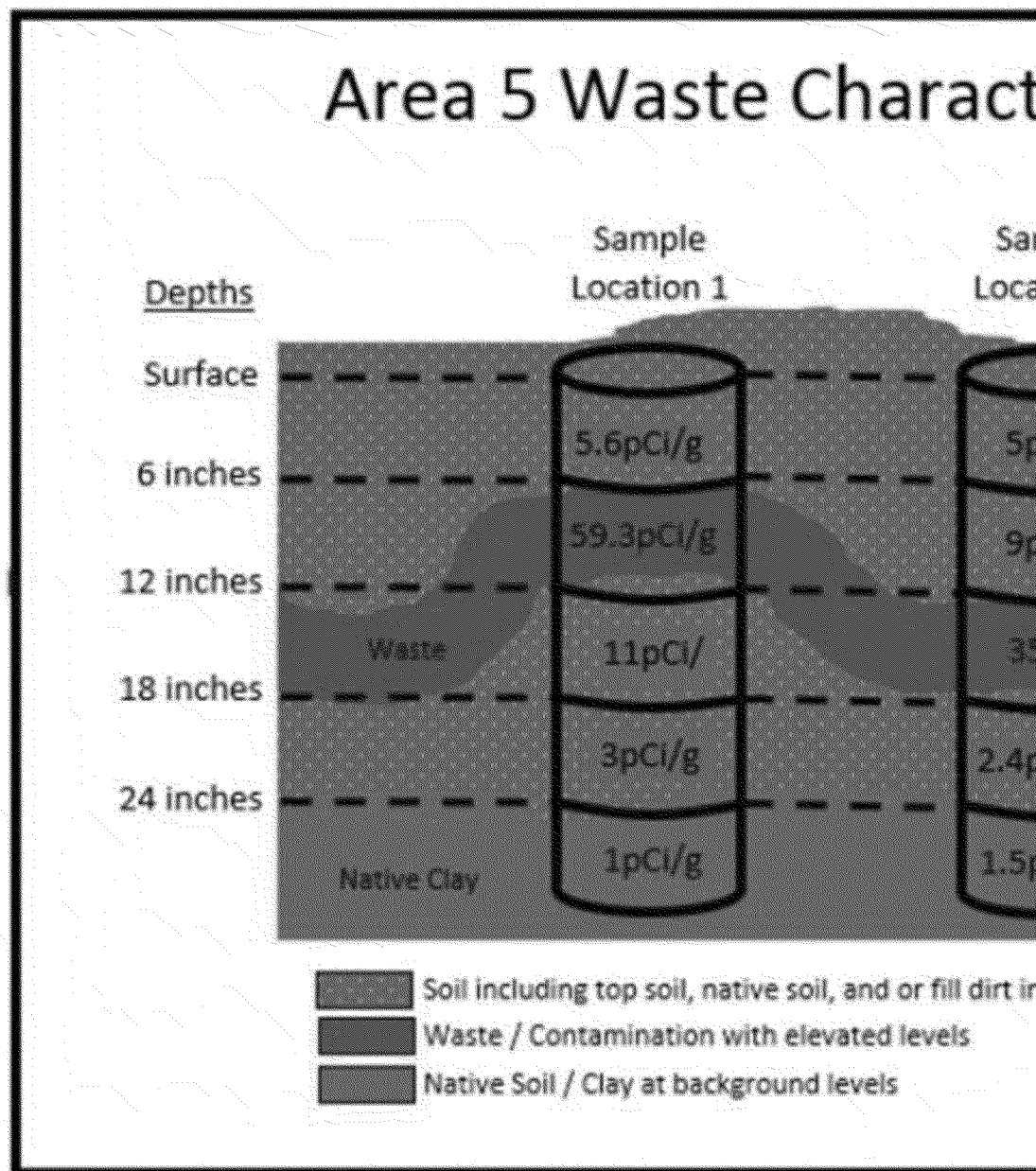


Figure 2. Visual/Example of the distribution of waste in the

**From:** tim.curtin@usecology.com / [mailto:tcurtin16@aol.com]

**Sent:** Friday, December 16, 2016 10:25 AM

**To:** Daly, Eric <Daly.Eric@epa.gov>; cory.mcmann@usecology.com

**Cc:** frodriguez@gesoncall.com; jkite@gesoncall.com; joel.belloni@usecology.com;  
jim.vigrass@usecology.com

**Subject:** Fwd: NFB Site: Area 5 Disposal Proposal

Eric, I sent on your e-mail to Joe early this morning. Please see his review below which he requested I send on to you.

**Cory based on Joe's review we should be all set for the additional trucks to be loaded on Monday.** Cory please respond to all of the above

with your agreement and we will ask Jim Vigrass to coordinate with GES to get what trucks they desire for Monday.

Thank you!

Tim Curtin/US Ecology

973.694.7525

[tcurtin@usecology.com](mailto:tcurtin@usecology.com)

-----Original Message-----

From: Joe Weismann <[joe.weismann@usecology.com](mailto:joe.weismann@usecology.com)>

To: Tim Curtin <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>

Cc: Kerry Durnen <[Kerry.Durnen@usecology.com](mailto:Kerry.Durnen@usecology.com)>; Cory McMann <[Cory.McMann@usecology.com](mailto:Cory.McMann@usecology.com)>;  
Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>

Sent: Fri, Dec 16, 2016 9:27 am

Subject: RE: NFB Site: Area 5 Disposal Proposal

Tim;

I've reviewed the Area 5 blending plan and think it is sound. The medium pile in its entirety can be sent as-is without further blending. I just have a few minor comments on the calculation document.

1. Although EPA is claiming to be using the highest measured sample values in all calculations, it appears that they are limiting the data to a single core sample (location) instead of the 3 highest regardless of location. Since the waste is all being mixed together anyway, I offer that the 3 highest values, regardless of location should be used. For example:

<b>As-Written</b>	<b>1st</b>	<b>2nd</b>	<b>3rd</b>	<b>Avg</b>	<b>Limit</b>	<b>SOR (U+Th)</b>
Ra-226	62.73	7.74	3.28	24.6	50	
Th-232	59.25	11.91	3.3	24.8	55	
U-238	73.35	7.74	3.28	28.1	167	0.620
<b>Proposed</b>	<b>1st</b>	<b>2nd</b>	<b>3rd</b>	<b>Avg</b>	<b>Limit</b>	<b>SOR (U+Th)</b>
Ra-226	62.73	29.64	7.74	33.4	50	
Th-232	59.25	27.13	11.91	32.8	55	
U-238	73.35	29.64	7.74	36.9	167	0.817

This change doesn't alter the decision since all nuclides continue to remain within USEM's WAC. I just think it better fits the narrative of using the highest sample results.

2. There are a also few typos on page 5 in the pargraph starting with "Let's determine..." Lyndsey has the limit concentrations for Th-232 and U-238 reversed here. However, they are correct later in this section (as part of the blending equations) and on Pg 6 in the SOR equations.

Please forward to Eric at EPA. If you have any questions, please let me know.

Thanks,

-JJW

**From:** [tim.curtin@usecology.com](mailto:tim.curtin@usecology.com) / [\[mailto:tcurtin16@aol.com\]](mailto:tcurtin16@aol.com)  
**Sent:** Friday, December 16, 2016 6:17 AM  
**To:** Joe Weismann <[joe.weismann@usecology.com](mailto:joe.weismann@usecology.com)>  
**Cc:** Kerry Durnen <[Kerry.Durnen@usecology.com](mailto:Kerry.Durnen@usecology.com)>; Cory McMann <[Cory.McMann@usecology.com](mailto:Cory.McMann@usecology.com)>; Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>  
**Subject:** Fwd: NFB Site: Area 5 Disposal Proposal

Joe, not sure if you are available this morning to review but to order trucks for Monday we should try and give Jim V that call this is acceptable material by noon EST today, Friday.

I am in the office today, please send e-mail or feel free to call me.

Thank you!

Tim

973.694.7525 - Office

-----Original Message-----

From: Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>

To: frodriguez <[frodriguez@gesoncall.com](mailto:frodriguez@gesoncall.com)>; jkite <[jkite@gesoncall.com](mailto:jkite@gesoncall.com)>; tim.curtin <[tim.curtin@usecology.com](mailto:tim.curtin@usecology.com)>; tcurtin16 <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>

Cc: Joel.Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; Peter.Lisichenko <[Peter.Lisichenko@WestonSolutions.com](mailto:Peter.Lisichenko@WestonSolutions.com)>; joe.weismann <[joe.weismann@usecology.com](mailto:joe.weismann@usecology.com)>; jim.vigrass <[jim.vigrass@usecology.com](mailto:jim.vigrass@usecology.com)>; Pellegrino, Carl <[Pellegrino.Carl@epa.gov](mailto:Pellegrino.Carl@epa.gov)>; Kappelman, David <[Kappelman.David@epa.gov](mailto:Kappelman.David@epa.gov)>

Sent: Thu, Dec 15, 2016 7:55 pm

Subject: NFB Site: Area 5 Disposal Proposal

Good Evening:

Today we shipped out three trucks and all went pretty well after we worked out the bugs with the first truck. The overall concept of our blending has been approved as well as the TCLP for the areas of interest for this winter's planned shipments (GNBC Office Area and Area 5). Attached is the rad proposal for Area 5 medium concentration material. Hopefully, Joe is done with his training and available to review the document. We performed gamma survey of Area 5 as we separated the different concentration layers. We also collected samples. Those samples were analyzed by our on-site HpGe as well as Pace Laboratory (alpha Spec and 21 day in-growth lab data documents attached). There is also a table with both lab and HpGe results.

Some clarifications. Pace Lab takes all three sample jars of each sample #, combines, dries, pulverizes and homogenizes. Then portions of the samples are used to perform the 21 day in-growth gamma spec and alpha spec. The gamma spec jar is a different size than what we use for our gamma spec as well.

Therefore, we need to do some more work on getting an “apples to apples” comparison with our gamma spec and theirs. We will start that in January. So the gamma readings we obtained was from a sample that was predominately the unprocessed rock-like high gamma material. So this was not really a true representation of the entire sample collected and not comparable to the laboratory results. However, we want to be conservative so we are proposing to use our HpGe results in determining our disposal proposal. In this case, the medium concentration material does not require blending but meets the acceptance criteria on its own.

Please let us know tomorrow if this is acceptable and we can schedule trucks for this material on Monday, December 19, 2016. If not, we will be forced to shut down operations until we return to site in January. Meaning, disposal is the only work we can conduct after tomorrow.

Thanks so much.

Regards,

Eric M. Daly  
On-Scene Coordinator/Radiological Response Specialist  
US Environmental Protection Agency- Region II

ERRD/RPB/PPS  
2890 Woodbridge Avenue  
Edison, NJ 08837  
[daly.eric@epa.gov](mailto:daly.eric@epa.gov)  
908-420-1707

"We must, indeed, all hang together, or assuredly we shall all hang separately",  
Benjamin Franklin

**From:** [tim.curtin@usecology.com](mailto:tim.curtin@usecology.com) / [<mailto:tcurtin16@aol.com>]

**Sent:** Wednesday, December 14, 2016 10:12 AM

**To:** [frodriguez@gesoncall.com](mailto:frodriguez@gesoncall.com); [jkite@gesoncall.com](mailto:jkite@gesoncall.com)

**Cc:** Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>; [Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com); Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; [Peter.Lisichenko@WestonSolutions.com](mailto:Peter.Lisichenko@WestonSolutions.com); [joe.weismann@usecology.com](mailto:joe.weismann@usecology.com); [jim.vigrass@usecology.com](mailto:jim.vigrass@usecology.com)

**Subject:** Re: NFB Site: Profile Finalization

Francisco, I will send this on to Jim Vigrass who is our Transportation Dir and your POC for ordering trucks, and I will call him as well

to see if tomorrow can be arranged.

I will ask Jim to circle back with you regarding the specifics of starting to ship tomorrow as well as any additional details. Please note

you will need to send orders for trucking needs to Jim directly to order trucks.

Thank you,

Tim Curtin

Dir. Sales & Mkt./USW Ecology

973.694.7525

[tcurtin@usecoloy.com](mailto:tcurtin@usecoloy.com)

-----Original Message-----

From: Francisco Rodriguez <[frodriguez@gesoncall.com](mailto:frodriguez@gesoncall.com)>

To: Janelle Kite <[jkite@gesoncall.com](mailto:jkite@gesoncall.com)>; Cory McMann <[Cory.McMann@usecology.com](mailto:Cory.McMann@usecology.com)>

Cc: Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>; Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; Peter.Lisichenko <[Peter.Lisichenko@WestonSolutions.com](mailto:Peter.Lisichenko@WestonSolutions.com)>; Joe Weismann <[joe.weismann@usecology.com](mailto:joe.weismann@usecology.com)>;



Tim Curtin <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>; Tim Curtin <[tim.curtin@usecology.com](mailto:tim.curtin@usecology.com)>  
Sent: Wed, Dec 14, 2016 10:03 am  
Subject: RE: NFB Site: Profile Finalization

All,

I agree, " Good News!". Now comes the question, how soon can we expect to schedule trucks. As of right now, there are three truckloads ready to ship. The box numbers and location are included in the attachments sent out by Eric. If possible, could we schedule at least one truck for tomorrow morning, Thurs. 12/15. I realize this is short notice. The reason is we have people going into rotation and holiday schedules and we would like to be able to go through our onsite procedures screening trucks and documentation before our key personnel leave for the holidays. Additional material from Area 5 may be ready to ship as soon as Monday of next week. Lyndsey is currently working on instrumentation and screening procedure proposal for that material.

Thanks you,

Frank Rodriguez

Response Manager

Guardian Environmental Services

70 Albe Drive

Newark, DE 19702

[frrodriguez@gesoncall.com](mailto:frrodriguez@gesoncall.com)

Cell: 302-803-1191

Office: 302-918-3070

Fax: 302-834-1959

**From:** Janelle Kite

**Sent:** Wednesday, December 14, 2016 9:09 AM

**To:** Cory McMann <[Cory.McMann@usecology.com](mailto:Cory.McMann@usecology.com)>

**Cc:** Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>; Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; Peter.Lisichenko@WestonSolutions.com; Joe Weismann <[joe.weismann@usecology.com](mailto:joe.weismann@usecology.com)>; Francisco Rodriguez <[frodriguez@gesoncall.com](mailto:frodriguez@gesoncall.com)>; Tim Curtin <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>; Tim Curtin <[tim.curtin@usecology.com](mailto:tim.curtin@usecology.com)>

**Subject:** Re: NFB Site: Profile Finalization

Good news!

*Sent from my Verizon Wireless 4G LTE DROID*

Cory McMann <[Cory.McMann@usecology.com](mailto:Cory.McMann@usecology.com)> wrote:

Thanks Eric,

I have set up the approval (L163014WDI) for Area 5 and the GNBC Office Building, if you could indicate those areas in section 14 of the manifest that will assist with the receiving process at WDI. You should see a price confirmation from Joel shortly.

Thanks

**From:** Daly, Eric [<mailto:Daly.Eric@epa.gov>]

**Sent:** Tuesday, December 13, 2016 5:21 PM

**To:** Cory McMann <[Cory.McMann@usecology.com](mailto:Cory.McMann@usecology.com)>; Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; Peter.Lisichenko@WestonSolutions.com; Joe Weismann <[joe.weismann@usecology.com](mailto:joe.weismann@usecology.com)>; Francisco Rodriguez <[frodriguez@gesoncall.com](mailto:frodriguez@gesoncall.com)>; Janelle Kite ([jkite@gesoncall.com](mailto:jkite@gesoncall.com)) <[jkite@gesoncall.com](mailto:jkite@gesoncall.com)>

**Cc:** Tim Curtin <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>; Tim Curtin <[tim.curtin@usecology.com](mailto:tim.curtin@usecology.com)>

**Subject:** RE: NFB Site: Profile Finalization

Hi Cory:

Those were not the only areas that had elevated metal results from our site wide assessment. For example, ID: N002-TRENCH-0003-01, Lab Sample 160-13352-14, Chromium is at 280 mg/kg , Lead at 1300 mg/kg. That sample is from GNBC Warehouse #3. We aren't performing that part of the removal until the Spring the earliest. Presently we are only addressing the two areas that we are excavating now and need to get moving on with T&D. Each area we address moving forward will have additional rad analysis as described previously in our proposal and now TCLP analysis prior to anything being shipped off site.

Thanks

**From:** Cory McMann [<mailto:Cory.McMann@usecology.com>]

**Sent:** Tuesday, December 13, 2016 4:28 PM

**To:** Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>; Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; Peter.Lisichenko@WestonSolutions.com; Joe Weismann <[joe.weismann@usecology.com](mailto:joe.weismann@usecology.com)>; Francisco Rodriguez <[frodriguez@gesoncall.com](mailto:frodriguez@gesoncall.com)>; Janelle Kite ([jkite@gesoncall.com](mailto:jkite@gesoncall.com)) <[jkite@gesoncall.com](mailto:jkite@gesoncall.com)>

**Cc:** Tim Curtin <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>; Tim Curtin <[tim.curtin@usecology.com](mailto:tim.curtin@usecology.com)>

**Subject:** RE: NFB Site: Profile Finalization

Hi Eric,

Just one question on the TCLP data. You indicated the analysis represents Area 5 and the office. Were those the only areas that hit for totals in the data set over marked:

ID: N001-SS001-1224-01, Lab Sample 160-13352-1, page 18, Chromium is at 1600 mg/kg

ID: N001-SS006-0012-01, Lab Sample 160-13352-6, page 23, Lead is at 110 mg/kg

ID: N001-SS007-0012-01, Lab Sample 160-13352-7, page 24, Barium is at 4300 mg/kg

ID: N002-SS001-0012-01, Lab Sample 160-13352-8, page 25, Chromium is at 210 mg/kg

ID: N002-TRENCH-0003-01, Lab Sample 160-13352-14, page 31, Chromium is at 280 mg/kg , Lead at 1300 mg/kg. This may be the one regarding the Trench you speak of below.

ID: N003-SS001-1022-1, Lab Sample 160-13352-15, page 32, Chromium is at 970 mg/kg

ID: N003-SS003-1224-01, Lab Sample 160-13352-17, page 34, Chromium is at 860 mg/kg

ID: N003-SS003-1224-02, Lab Sample 160-13352-18, page 35, Chromium is at 790 mg/kg

I am trying to relate what was above for totals to the TCLP analysis, are you expecting to run additional TCLP analysis for other areas?

Thanks

**From:** Daly, Eric [<mailto:Daly.Eric@epa.gov>]

**Sent:** Tuesday, December 13, 2016 11:56 AM

**To:** Cory McMann <[Cory.McMann@usecology.com](mailto:Cory.McMann@usecology.com)>; Joel Belloni

<[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>;

[Peter.Lisichenko@WestonSolutions.com](mailto:Peter.Lisichenko@WestonSolutions.com); Joe Weismann <[joe.weismann@usecology.com](mailto:joe.weismann@usecology.com)>;

Francisco Rodriguez <[frodriguez@gesoncall.com](mailto:frodriguez@gesoncall.com)>; Janelle Kite ([jkite@gesoncall.com](mailto:jkite@gesoncall.com))

<[jkite@gesoncall.com](mailto:jkite@gesoncall.com)>

**Cc:** Tim Curtin <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>; Tim Curtin <[tim.curtin@usecology.com](mailto:tim.curtin@usecology.com)>

**Subject:** NFB Site: Profile Finalization

**Importance:** High

Good Morning Everyone:

We have been really busy. Slowly but surely making progress here at the site. We sent out samples from Area 5 and the GNBC Office for TCLP. Those results are attached. Thankfully, no results exceed the TCLP limits. With the acceptance of the GNBC Office blending disposal plan last month (attached) and now the clearance of the TCLP, we should be ready to start shipping the office area. Right now we have segregated the GNBC cubic hard boxes into three Conex Containers. Each container has 22 cubic yard boxes. 16 higher concentration boxes with 6 low concentration boxes as per the blending document. I have attached a truck loading

document that breaks down the specific boxes (ID# and individual box weight).

We are still working with the lab to get data on Area 5. We may have some other proposals later utilizing the low level material we have from Area 5 to blend with the remainder of the high concentration cubic yard boxes from GNBC. Lyndsey may be calling Joe today if he is available.

Thanks

Regards,

Eric M. Daly  
On-Scene Coordinator/Radiological Response Specialist  
US Environmental Protection Agency- Region II

ERRD/RPB/PPS  
2890 Woodbridge Avenue  
Edison, NJ 08837  
[daly.eric@epa.gov](mailto:daly.eric@epa.gov)  
908-420-1707

"We must, indeed, all hang together, or assuredly we shall all hang separately",  
Benjamin Franklin

**From:** Cory McMann [<mailto:Cory.McMann@usecology.com>]  
**Sent:** Tuesday, November 29, 2016 4:50 PM

**To:** Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>; Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; [Peter.Lisichenko@WestonSolutions.com](mailto:Peter.Lisichenko@WestonSolutions.com); [Robert.Croskey@WestonSolutions.com](mailto:Robert.Croskey@WestonSolutions.com); Joe Weismann <[joe.weismann@usecology.com](mailto:joe.weismann@usecology.com)>  
**Cc:** Tim Curtin <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>  
**Subject:** RE: NFB Site: Profile Finalization

Thanks Eric,

It's difficult to negate the chromium results based on the blank results and since there are lead and barium concerns I recommend running TCLP for those constituents.

Joe, I know you approved the rad procedure are you waiting on additional analysis?

Cory

**From:** Daly, Eric [<mailto:Daly.Eric@epa.gov>]  
**Sent:** Tuesday, November 29, 2016 12:52 PM  
**To:** Cory McMann <[Cory.McMann@usecology.com](mailto:Cory.McMann@usecology.com)>; Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; [Peter.Lisichenko@WestonSolutions.com](mailto:Peter.Lisichenko@WestonSolutions.com); [Robert.Croskey@WestonSolutions.com](mailto:Robert.Croskey@WestonSolutions.com)  
**Cc:** Tim Curtin <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>  
**Subject:** NFB Site: Profile Finalization  
**Importance:** High

Hi:

I apologize for the delayed response. I am in our REOC this week and addressing response issues. I understand. I actually have a write up that I always use. I wanted to make sure we were all on same page. I made a pdf of my cheat sheet and attached.

As I look closer to the data, I see a note on the chromium results “Compound was found in the blank and sample”. **So I assume there was a cross contamination issue in the lab? Does that put in question all values for the chromium results?**

ID: N001-SS001-1224-01, Lab Sample 160-13352-1, page 18, Chromium is at 1600 mg/kg, ID: N002-SS001-0012-01, Lab Sample 160-13352-8, page 25, Chromium is at 210 mg/kg, ID: N003-SS001-1022-1, Lab Sample 160-13352-15, page 32, Chromium is at 970 mg/kg, ID: N003-SS003-1224-01, Lab Sample 160-13352-17, page 34, Chromium is at 860 mg/kg, ID: N003-SS003-1224-02, Lab Sample 160-13352-18, page 35, Chromium is at 790 mg/kg?

ID: N001-SS006-0012-01, Lab Sample 160-13352-6, page 23, Lead is at 110 mg/kg . **For this sample the Rule of 20 would be 5.5 mg/l of lead with the limit being 5.0 mg/l.**

ID: N001-SS007-0012-01, Lab Sample 160-13352-7, page 24, Barium is at 4300 mg/kg. **For this sample the Rule of 20 would be 215 mg/l of Barium with the limit being 100 mg/l.**

ID: N002-TRENCH-0003-01, Lab Sample 160-13352-14, page 31, Chromium is at 280 mg/kg (**14 mg/l: 5.0 mg/l**), Lead at 1300 mg/kg (**65 mg/l: 5 mg/l**). This may be the one regarding the Trench you speak of below.

We will have a TCLP sampling strategy for the waste. At this time, we will only be sampling/analyzing the material we have excavated and plan to dispose. We need to put a rush on this analytical in order to get the disposal process moving. At a later date we will obtain TCLP information for other areas.

**So as I understand it, our radiological procedures are approved but we just**

**need to verify the RCRA characteristics.**

Please let me know if there are any questions at this time.

Regards,

Eric M. Daly  
On-Scene Coordinator/Radiological Response Specialist  
US Environmental Protection Agency- Region II

ERRD/RPB/PPS  
2890 Woodbridge Avenue  
Edison, NJ 08837  
[daly.eric@epa.gov](mailto:daly.eric@epa.gov)  
908-420-1707

"We must, indeed, all hang together, or assuredly we shall all hang separately",  
Benjamin Franklin

**From:** Cory McMann [<mailto:Cory.McMann@usecology.com>]  
**Sent:** Tuesday, November 29, 2016 9:05 AM  
**To:** Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; Peter.Lisichenko@WestonSolutions.com; [Robert.Croskey@WestonSolutions.com](mailto:Robert.Croskey@WestonSolutions.com)  
**Cc:** Tim Curtin <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>  
**Subject:** RE: NFB Site: Profile Finalization

Just to clarify, the total results divide by 20 are the hurdle based on the analysis provided. If TCLP analysis on representative sample(s) can be completed showing the levels below are not exceeded the waste can be accepted at WDI. However, if the analysis shows the waste exhibits a characteristic the waste can still be accepted for stabilization at MDI (with some profile modifications) and final disposal to occur at WDI.



Cory

**From:** Joel Belloni  
**Sent:** Tuesday, November 29, 2016 8:52 AM  
**To:** Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>;  
[Peter.Lisichenko@WestonSolutions.com](mailto:Peter.Lisichenko@WestonSolutions.com); [Robert.Croskey@WestonSolutions.com](mailto:Robert.Croskey@WestonSolutions.com)  
**Cc:** Cory McMann <[Cory.McMann@usecology.com](mailto:Cory.McMann@usecology.com)>; Tim Curtin <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>  
**Subject:** RE: NFB Site: Profile Finalization

Chromium should be below 5 mg/L, Lead below 5 mg/L and Barium below 100 mg/L.

**Joel D. Belloni**

*Technical Service Specialist*

734.521.8015

734.589.9608 cell

[joel.belloni@usecology.com](mailto:joel.belloni@usecology.com)

In observance of the Thanksgiving holiday, US Ecology will be closed on 11/24/2016 and 11/25/2016

**From:** Daly, Eric [<mailto:Daly.Eric@epa.gov>]  
**Sent:** Tuesday, November 29, 2016 8:46 AM  
**To:** Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Nguyen, Lyndsey  
<[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; [Peter.Lisichenko@WestonSolutions.com](mailto:Peter.Lisichenko@WestonSolutions.com);  
[Robert.Croskey@WestonSolutions.com](mailto:Robert.Croskey@WestonSolutions.com)  
**Subject:** NFB Site: Profile Finalization

Good Morning Everyone:

I hope everyone had a nice holiday. I am hoping to get back on track with our profile finalization. As far as the metals exceedance, we are working on a proposal for TCLP analysis. Joel, what regulatory levels are you referring to so we are all on the same page.

Thanks

**From:** Joel Belloni [<mailto:Joel.Belloni@usecology.com>]

**Sent:** Thursday, November 17, 2016 4:14 PM

**To:** Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>;  
[Peter.Lisichenko@WestonSolutions.com](mailto:Peter.Lisichenko@WestonSolutions.com); [Robert.Croskey@WestonSolutions.com](mailto:Robert.Croskey@WestonSolutions.com)

**Subject:** RE: Profile Finalization- Niagara Falls

ID: N001-SS001-1224-01, Lab Sample 160-13352-1, page 18, Chromium is at 1600 mg/kg

ID: N001-SS006-0012-01, Lab Sample 160-13352-6, page 23, Lead is at 110 mg/kg

ID: N001-SS007-0012-01, Lab Sample 160-13352-7, page 24, Barium is at 4300 mg/kg

ID: N002-SS001-0012-01, Lab Sample 160-13352-8, page 25, Chromium is at 210 mg/kg

ID: N002-TRENCH-0003-01, Lab Sample 160-13352-14, page 31, Chromium is at 280 mg/kg ,  
Lead at 1300 mg/kg. This may be the one regarding the Trench you speak of below.

ID: N003-SS001-1022-1, Lab Sample 160-13352-15, page 32, Chromium is at 970 mg/kg

ID: N003-SS003-1224-01, Lab Sample 160-13352-17, page 34, Chromium is at 860 mg/kg

ID: N003-SS003-1224-02, Lab Sample 160-13352-18, page 35, Chromium is at 790 mg/kg

Thank you,

**Joel D. Belloni**

*Technical Service Specialist*

734.521.8015

734.589.9608 cell

[joel.belloni@usecology.com](mailto:joel.belloni@usecology.com)

In observance of the Thanksgiving holiday, US Ecology will be closed on 11/24/2016 and 11/25/2016

**From:** Daly, Eric [<mailto:Daly.Eric@epa.gov>]  
**Sent:** Thursday, November 17, 2016 3:34 PM  
**To:** Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com  
**Subject:** RE: Profile Finalization- Niagara Falls

Hi Joel:

Could you please identify which samples you are referring to? If one result for high lead is the GNBC Warehouse 4 Trench Sample, we are aware and spoke about handling this one area separately. That was an oil drain and we took a sample there just for that purpose. That does not represent the entire Site. Please note, that area is not one of the areas planned to initially ship in 2016.

Thanks

**From:** Joel Belloni [<mailto:Joel.Belloni@usecology.com>]  
**Sent:** Thursday, November 17, 2016 2:07 PM  
**To:** Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>  
**Subject:** Profile Finalization- Niagara Falls

Good Afternoon-

We have completed the review of the radiological portion of the analysis and we have an outstanding issue in regards to the RCRA component. In the analysis attached, there are several hits for Cadmium and Lead that are above regulatory levels. Since this analysis was ran in totals, some of the hits are not below the divide by twenty rule. Is there any TCLP analysis available? Would it be possible to pull a representative sample prior to shipping to show the codes don't apply?

Let me know your thoughts and we can wrap this up shortly.

Regards,

**Joel D. Belloni**

Technical Service Specialist

[joel.belloni@usecology.com](mailto:joel.belloni@usecology.com)

p: 734.521.8015 | c: 734.589.9608 | f: 734.521.8142

17440 College Parkway Suite 300 Livonia, MI 48152

In observance of the Thanksgiving holiday, US Ecology will be closed on 11/24/2016 and 11/25/2016

*Emergency Response: 800.839.3975*

*Customer Service: 800.592.5489*